

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

**CATHOLIC LEGAL IMMIGRATION
NETWORK, INC., et al.,**

Plaintiffs,

V.

Civil Action No. 8:20-cv-02042-TDC

**UNITED STATES CITIZENSHIP AND
IMMIGRATION SERVICES, et al.,**

Defendants.

JOINT STATUS REPORT

In accordance with the parties' proposal to submit a joint status report on a monthly basis, as stated in their Joint Motion to Stay All Proceedings filed on September 28, 2020 (ECF No. 18 at 6), the parties, by and through undersigned counsel, hereby file this Joint Status Report, and state as follows:

1. Catholic Legal Immigration Network, Inc., Alianza Americas, and National TPS Alliance (Plaintiffs) commenced the instant action against the United States Citizenship and Immigration Services (USCIS), United States Department of Homeland Security (DHS), and United States Department of State (State), (collectively, Defendants) to compel compliance with the Freedom of Information Act (FOIA). Specifically, the Complaint seeks responses to three separate FOIA requests submitted to USCIS (“Request 1”), State (“Request 2”), and DHS (“Request 3”) respectively. (Compl. ¶¶ 27-40.)

2. On October 6, 2021, USCIS produced its twelfth rolling release of documents comprised of 30 pages released in full and 349 pages released in part from the Office of Policy and Strategy component (OP&S) to Plaintiffs in response to Request 1. USCIS's twelfth rolling release also included a supplemental release of one page released in full and 20 pages released in

part from OP&S, which replaced previously produced pages that have been rereviewed pursuant to Plaintiffs' request. USCIS is presently processing the thirteenth production of USCIS pages. Subject to FOIA exemptions, the thirteenth production of USCIS pages is expected to be produced on or about November 6, 2021. Per the request of Plaintiffs, the thirteenth production will consist of responsive, non-FOIA exempt documents from OP&S.

3. State produced its tenth rolling release on September 16, 2021 comprised of 14 records released in part and 14 records withheld in full. State also made its eleventh rolling release on October 15, 2021, comprised of 10 records released in part. State is continuing to collect unclassified potentially responsive documents. The twelfth production of responsive, non-exempt material, to the extent any such material is identified, will be made on or before November 17, 2021. Despite continued challenges presented by COVID-19, State has also completed its searches of classified systems.

4. The parties are continuing to engage in discussions regarding the possible narrowing or prioritization of Plaintiffs' FOIA requests.

Dated: October 15, 2021

Respectfully submitted,

_____/s/_____
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